EXHIBIT 4

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

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In re : Chapter 9

CITY OF DETROIT, MICHIGAN, : Case No. 13- 53846

Debtor. : Hon. Steven W. Rhodes

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CERTIFICATE OF SERVICE

I hereby certify that on March 27, 2014, I caused the City Of Detroit's Second Supplement, to Correct Technical Errors, to the Motion of Debtor for Entry of an Order, Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rule 9019, Approving a Settlement and Plan Support Agreement and Granting Related Relief to be electronically filed with the Clerk of the Court using the ECF system, which will send notification of such filing to all counsel registered to receive notice in this adversary proceeding.

/s/ Deborah Kovsky-Apap Robert S. Hertzberg (P30261) Deborah Kovsky-Apap (P68258) PEPPER HAMILTON LLP 4000 Town Center Southfield, Michigan 48075 Telephone: (248) 359-7300 Facsimile: (248) 359-7700 hertzbergr@pepperlaw.com kovskyd@pepperlaw.com

ATTORNEYS FOR THE CITY OF DETROIT